

SPEISER KRAUSE

COUNSELLORS AT LAW

800 Westchester Avenue

Suite South 608

Rye Brook, New York 10573

5555 GLENRIDGE CONNECTOR, NE
SUITE 550
ATLANTA, GA 30342
(404) 751-0632

PHONE: (914) 220-5333 FAX: (914) 220-5334

WWW.SPEISERKRAUSE.COM

ADDITIONAL
OFFICE LOCATIONS
GARDEN CITY, NY
METROPOLITAN DC

65
years

July 14, 2022

VIA ECF

The Honorable George B. Daniels
U.S. District Judge
United States District Court
Southern District of New York
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, New York 10007

Re: *In Re Terrorist Attacks of September 11, 2001*, No. 03 MDL 1570

This filing relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and
member case *Burlingame v. Bin Laden, et al.*, 02-cv-7230 (GDB)(SN))

Dear Judge Daniels and Magistrate Judge Netburn:

We write to you today on behalf of certain Plaintiffs in the above-captioned matters to apprise the Court of time sensitive issues regarding the United States Victims of State Sponsored Terrorism Fund ("USVSST") Fund and Plaintiffs' pending motion before the Court. As the Court is aware, judgments entered against the Islamic Republic of Iran may be considered eligible for participation with the USVSST Fund for partial compensation. The USVSST Fund recently published on its website (www.usvsst.com), "[i]f the USVSST Fund determines that sufficient funds are available to authorize a distribution by January 1, 2023, the application deadline for new claimants to be considered for fourth-round payments will be August 1, 2022."

Given the USVSST Fund's statement on its website regarding an application deadline for new claimants, eight Plaintiffs seek the entry of default judgments for solatium damages in the pending motion before the Court at ECF No. 8081, Filed 06/08/2022 (Motion for Partial Final Judgments for *Burlingame XII* claimants) to allow them to proceed with claims in the Fund in advance of the publicized deadline.

In anticipation of the Fund's August 1, 2022, deadline for new applications, we seek the Court's counsel on how to best effectuate this motion in the tight timeline remaining without

SPEISER KRAUSE

creating an overly burdensome task for the Court. If the Court should need any additional information, please contact the undersigned. Thank you and best regards.

Respectfully,



Frank H. Granito

cc: All Counsel of Record via ECF